REMARKS/ARGUMENTS

The rejections presented in the Office Action dated August 9, 2007(hereinafter Office Action) have been considered. Claims 1-32 remain pending in the application. Reconsideration of the pending claims and allowance of the application in view of the present response is respectfully requested.

Claims 22-25 are rejected under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter. Applicant traverses the rejection of Claims 22-25 35 under U.S.C. § 101 but have amended Claim 22 to address the rejection. The Applicant submits that the rejection of Claims 22-25 under 35 U.S.C. § 101 is substantially an objection as to form, and the amendment to Claim 22 neither raises new issues that would require further search nor raises any issues of new matter. Further, the amendment places the Application in better form for Appeal by materially reducing or simplifying the issues for appeal. Thus is it respectfully requested that the amendments be entered and the rejection withdrawn.

Claims 1, 2, 4, 7, 9, 12, 13, 15, 16, 22, 23, 26, 27 and 29-31 are rejected based on 35 U.S.C. §103(a) as being unpatentable over U.S. Publication No. 2003/0236912 by Klemets et al. (hereinafter "Klemets") in view of U.S. Patent No. 7,233,979 to Dickerman et al. (hereinafter "Dickerman") and U.S. Publication No. 2004/0133683 by Keller et al. (hereinafter "Keller"). Claims 3, 5, 6, 14, 24, 28 and 32 are rejected based on 35 U.S.C. §103(a) as being unpatentable over Klemets, Dickerman and Keller and further in view of U.S. Patent No. 6,845,389 to Sen et al. (hereinafter "Sen"). Claims 8, 10, 11 and 25 are rejected based on 35 U.S.C. §103(a) as being unpatentable over Klemets, Dickerman and Keller and further in view of U.S. Publication No. 2002/0129236 by Nuutinen (hereinafter "Nuutinen"). Claims 17-18, 20 and 21 are rejected based on 35 U.S.C. §103(a) as being unpatentable over Klemets in view of Dickerman and Keller. Claim 19 is rejected based on 35 U.S.C. §103(a) as being unpatentable over Klemets in view of Dickerman and U.S. Publication No. 2004/0009761 by Money et al. (hereinafter "Money") and further in view of Keller.

Applicant traverses each of the grounds of rejection under 35 U.S.C. §103(a), at least because the asserted references, alone or in combination, do not correspond to the claimed invention. In order to maintain a §103(a) rejection, the Examiner must identify a reference, or a combination of references, that teaches or suggests each of the claimed limitations and present evidence necessary to identify the reason why a person of ordinary skill in the art would have combined the prior art elements in the asserted manner. Applicant maintains that at least the first of these requirements have not been satisfied.

Each of the grounds of rejection are discussed in detail below. As each of the grounds of rejection are based at least in part upon the teachings of the primary reference, Klemets, the arguments presented against the grounds of rejection lettered B-H are somewhat duplicative of the arguments presented against the first grounds addressed in Section A. However, the arguments presented in Sections B-H below, and in particular Sections B-E, also include arguments specific to their respective grounds of rejection.

A. The §103(a) rejection of Claims 1, 2, 4, 7, 9, 30, and 31 is improper because the asserted combination of Klemets, Dickerman, and Keller fails to teach or suggest all the limitations of the claimed invention.

Contrary to the assertions in the Office Action, the primary reference, Klemets, does not, and cannot, correspond to the claimed limitations identified by the Examiner as being described in Klemets. Independent Claims 1 and 30 include limitations directed to communicating a request from the application of a terminal to a session descriptor module of the terminal, wherein the session descriptor module operates on the terminal independently of the application. Applicant maintains that Klemets does not teach or suggest, at least, any communication of requests between applications and a session description module running on the same terminal, and neither Dickerman nor Keller overcome these deficiencies in the teachings of Klemets.

The Examiner relies upon paragraphs 0032, 0041, and 0097-0139 of Klemets as allegedly corresponding to the above discussed limitations. In the final Office Action at the top of page 5, the Examiner further asserts that "Klemets discloses communicating between

application and session descriptor module independently running on the terminal (page 5, 0047, '*software* and data structures are operable with any session *description message 502*, *protocol*, or format and not specifically limited to *SDP* or any other format or protocol'" (emphasis in original). Applicant respectfully disagrees, and submits that Klemets fails to teach or suggest communicating any session description within modules and applications of a terminal.

First, as Applicant has previously asserted, paragraphs 0032, 0041, and 0097-0139 do not teach or suggest any intra-terminal communication of session descriptor-related data. Applicant notes that paragraphs 0097-0139 only describes a data structure, and are irrelevant in showing any communications or functional modules as described in the rejected claims. Paragraph 0032 describes interactions between a client 106 and media server 104. The Examiner relies on this same paragraph to allegedly teach another element of Claim 1, namely to show receiving a multimedia session request from a network entity via an application of the terminal (e.g., "client 106 initiates a connection to the server 104 using a RTSP SETUP command"). While not acquiescing to this characterization of the claims or Klemets, the Applicant respectfully points out that the rejections are equating one of the client 106 and the media server 104 to the terminal of Claim 1, and is equating the other of the client 106 and media server 104 to the network entity of Claim 1.

In the same rejection of Claims 1 and 30, the Examiner then relies on paragraph 0032 in combination with paragraph 0041 to show "communicating the session descriptor request from the application to a session descriptor module of the terminal". As stated above, paragraph 0032 only describes interactions between the client 106 and server 104, and none of the descriptions of the actions of these entities (e.g., "client 106 retrieves the various properties of the session such as an identifier;" "client 106 is also free to choose which streams it wants to SETUP ," "server 104 responds to the SETUP request validating the client request;" etc.) is sufficient to teach or suggest inter-device communications between an application and a session description module. Similarity, paragraph 0041 describes a flow diagram that "illustrates the interaction between the client 106 and the

server 104 to initiate a streaming media session," but fails to describe with any specificity the inner workings of the client 106 or server 104.

Therefore, there can be no reliance on these or any other paragraphs of Klemets to show intra-terminal communications between an application and module. The rejection also relies on FIG. 4 and paragraphs 0017, 0047-0048, and 0097-0139 to show "communicating the session descriptor from the session descriptor module to the application in response to the session descriptor request." Paragraph 0017 describes a "computer-readable media store a data structure representing a description message transmitted by a server to at least one client via a description protocol," however it is not reasonable to interpret a stored data structure as a "module" that operates independently of an application. Similarly paragraphs 0047-0048 describe "the structure of a session description message 502 or a presentation description or the like," and paragraphs 0097-0139 are a listing from "excerpts from an SDP content description." All of these excerpts describe only data structures, and fail to teach or suggest any module that operates on a terminal independently with an application and communicates session descriptor-related data with the application.

"All words in a claim must be considered in judging the patentability of a claim against the prior art." *In re Wilson*, 424 F.2d 1382, 165 USPQ 494 (CCPA 1970). Claims 1 and 30 explicitly describe a session descriptor module operating on a terminal independently of an application, and nowhere does Klemets teach or suggest such and application or module. Further, the Examiner's emphasizes Klemets' description of "*software* and data structures are operable with any session *description message 502*, *protocol*, or format and not specifically limited to *SDP* or any other format or protocol," but this fails to teach or suggest a session descriptor module operating on a terminal independently of a terminal application. This excerpt of Klemets is merely a statement that the embodiments described in Klemets are not to be limited to SDP message formats and protocols, and nowhere does Klemets describe "software" in any detail that would teach or suggest the specific elements of Applicant's Claims 1 and 30.

Neither Dickerman nor Keller were relied upon to remedy the deficiencies of Klemets as it applies to a session description module that operates on a terminal

independently with an application and communicates session descriptor data with the application, nor do Dickerman nor Keller provide such a remedy. Thus because none of Klemets, Dickerman, or Keller teach or suggest these features of rejected Claims 1 and 30, the combination of Klemets, Dickerman, or Keller fail to teach or suggest those features. Applicant further submits that Dickerman fails to teach what was relied upon in the Office Action.

On page 5 of the Office Action, the Examiner cites FIG. 1 and col. 3 line 64 to col. 4, line 28 of Dickerson to show "forming a session descriptor request by the application to determine multimedia capabilities of the terminal in response to the multimedia session request." However, Dickerson does not disclose any requests to determine multimedia capabilities of a terminal. The only discussion in the cited portions of Dickerman that are relevant to intra-device communications states:

> Messenger client platform module 108 provides real-time communication messaging services between respective clients 106. Such communication services include transmitting notifications (e.g., client 106 online presence or status and messages) to clients 106 in a scalable fashion such as within an organizational intranet and/or across a loosely coupled or federated constellation of servers 102. Each platform module 108 exposes a number of SIAPI interfaces 112 to enable two networked client programs (e.g., messenger platform clients 108 and/or non-messenger platform clients 110) to programmatically arrange peer-to-peer sessions. Virtually any type of application 110 (e.g., word processing, e-mail, image processing, etc.) can implement SIAPI 112 to arrange a peer-to-peer session over the instant messaging capabilities of system 100.

As should be apparent from this excerpt, the communications described in Dickerman are only for purposes of determining network connection capabilities of the client platform (e.g., "to arrange a peer-to-peer session over the instant messaging capabilities of system 100") and not for determining multimedia capabilities. Further, Dickerman fails to suggest such a request for multimedia capabilities, because Dickerman is directed to "a programmatic interface for other applications to leverage data sending capabilities of the messaging application 108 to send data from one device 106 to another device 106," and at most this describes the determination of data sending capabilities of a device for purposes of peer-to-peer data transfer. Further, Dickerman fails to describe any communications sessions that could be described as "multimedia" as such term is known

and used in the art, or any sessions that would use a session description data describing multimedia capabilities of the terminal.

The Office Action also appears to rely on Keller to show application requests to determine multimedia capabilities of a terminal on which the application is running. Unlike Dickerman, Keller *is* applicable to multimedia sessions (e.g., "session controller 206 is responsible for determining whether or not a requested multimedia session can be established," Keller, 0036). However, Keller is directed to "a system for controlling and managing session between at least two endpoints" (Keller, Abstract), and in particular for "a call control architecture that takes advantage of the application layer routing control of SIP to enable a user to initiate a session." (Keller, 0014). Thus Keller is focused on a system-wide solution to session management, and neither teaches nor suggests any inter-terminal functions or communications. For example, Keller describes an intermediary network node called a "parameter resolver 214" that "retrieves the capabilities for each of the users' terminals, also preferably from an appropriate database." However, this retrieval capability does not occur within the user terminals because it explicitly involves an intermediary network node determining capabilities from "an appropriate database."

For the reasons set forth above, the teachings of Klemets, alone or in combination with the teachings of Dickerson and Keller, do not correspond to several of the claimed limitations. Thus, the §103(a) rejection based upon the teachings of Klemets as modified by Dickerson and Keller, cannot be maintained. Applicant accordingly requests that the rejection be withdrawn.

Dependent Claims 2, 4, 7, 9, and 31, which depend respectively from independent Claims 1 and 30, also stand rejected under 35 U.S.C. §103(a) over the above-discussed combination of Klemets, Dickerman, and Keller. While Applicant does not acquiesce with any particular rejections to these dependent claims, including any assertions concerning common knowledge, obvious design choice and/or what may be otherwise well-known in the art, it is believed that these rejections are moot in view of the arguments made in connection with the independent claims. These dependent claims include all of the limitations of their respective base claims, and any intervening claims, and recite additional

features which further distinguish these claims from the cited references. "If an independent claim is nonobvious under 35 U.S.C. §103, then any claim depending therefrom is nonobvious." MPEP §2143.03; *citing In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). Therefore, dependent Claims 2, 4, 7, 9, and 31 are also allowable over the combination of Klemets, Dickerman, and Keller.

For at least this reason, the Applicant submits that the Examiner's rejection of Claims 1, 2, 4, 7, 9, 30, and 31 includes errors of finding of fact, which has led to a rejection that is grounded in an error of law. The Applicant respectfully submits that the resulting error of law compels withdrawal of this rejection, as *prima facie* obviousness is not established.

B. The §103(a) rejection of dependent Claims 12, 13, 15, 16 is improper because the reasons for rejection were not fully and clearly stated, and because the asserted combination of Klemets, Dickerman, and Keller fails to teach or suggest all the limitations of the claimed invention.

According to the Office Action, independent Claim 12 "is rejected for the same reasons set forth in claim 1 above," and the rejection further cites portions of Klemets that allegedly teach or suggest "one or more data processing arrangements coupled to a network and adapted to exchange multimedia data via the network," and "a memory for storing an application and a session descriptor module." Without acquiescing to these characterizations, the Applicant submits that a rejection "for the same reasons set forth in claim 1 above" does not address all the recitations Claim 12. For example, Claim 12 recites "the application and session description module operating independently of each other" whereas Claim 1 recites "the session descriptor module operates on the terminal independently of the application." Further, Claim 12 recites "the processor operable by the session descriptor module for providing to the application session descriptor data based on multimedia session parameters that describe multimedia capabilities of the multimedia terminal" whereas Claim 1 recites "forming a session descriptor based on multimedia session parameters of the terminal" and "communicating the session descriptor from the session descriptor module to the application in response to the session descriptor request."

Although Claims 1 and 12 may share similar characteristics relating to various embodiments of the disclosed invention, these claims use noticeably different wording. As such, Applicant cannot conclusively determine which parts of the asserted references are allegedly being applied to the various features of Claim 12. Nonetheless, Applicant submits that the reasons given in Section A above that the combination of Klemets, Dickerman, and Keller fail to teach or suggest any communication between an application and session description module running on the same terminal, are also sufficient to show that the combination of references fails to teach or suggest a terminal comprising an "application and session description module operating independently of each other." Similarly, because the combination of Klemets, Dickerman, and Keller fail to teach or suggest either an intra-terminal request or determination of multimedia capabilities as described in Section A, it can be shown that this combination fails to teach or suggest a "processor operable by the session descriptor module for providing to the application session descriptor data based on multimedia session parameters that describe multimedia capabilities of the multimedia terminal."

For the reasons discussed above in connection with Section A, Applicant respectfully maintains that the combination of Klemets, Dickerman, and Keller fails to teach or suggest each of the claim limitations of Claim 12. Dependent Claims 13, 15, 16, depend from independent Claim 12 and also stand rejected under 35 U.S.C. §103(a) over the above-discussed combination of Klemets, Dickerman, and Keller. While Applicant does not acquiesce with any particular rejections to these dependent claims, including any assertions concerning common knowledge, obvious design choice and/or what may be otherwise well-known in the art, it is believed that these rejections are moot in view of the arguments made in connection with the independent claim.

For at least this reason, the Applicant submits that the Examiner's rejection of Claims 12, 13, 15, 16 includes errors of finding of fact, which has led to a rejection that is grounded in an error of law. The Applicant respectfully submits that the resulting error of law compels withdrawal of this rejection, as *prima facie* obviousness is not established.

C. The §103(a) rejection of Claims 22 and 23 is improper because the reasons for rejection were not fully and clearly stated, and because the asserted combination of Klemets, Dickerman, and Keller fails to teach or suggest all the limitations of the claimed invention.

According to the Office Action, Claim 22 "is rejected for the same reasons set forth in claim 1 above," and further cites portions of Klemets that allegedly teach or suggest "computer-readable medium having instructions stored thereon which are executable by a terminal for establishing a multimedia session via a network." Without acquiescing to these characterizations, the Applicant submits that a rejection "for the same reasons set forth in claim 1 above" does not address all the recitations Claim 22. For example, Claim 22 recites "receiving from an independently operating application of the terminal a request for a session description that describes multimedia capabilities of the terminal and is usable for establishing the multimedia session" whereas Claim 1 recites "communicating the session descriptor request from the application to a session descriptor module of the terminal, wherein the session descriptor module operates on the terminal independently of the application." Further, Claim 22 recites "determining a set of system parameters affecting the establishment of the multimedia session in response to the request" and "forming the session descriptor based on the system parameters" whereas Claim 1 recites "forming a session descriptor based on multimedia session parameters of the terminal."

Although Claims 1 and 22 may share similar characteristics relating to various embodiments of the disclosed invention, these claims use noticeably different wording. As such, Applicant cannot conclusively determine which parts of the asserted references are allegedly being applied to the various features of Claim 22. Nonetheless, Applicant submits that the reasons given in Section A above that the combination of Klemets, Dickerman, and Keller fail to teach or suggest any communication between an application and session description module running on the same terminal, are also sufficient to show that the combination of references fails to teach or suggest a instructions for "receiving from an independently operating application of the terminal a request for a session description." Similarly, because the combination of Klemets, Dickerman, and Keller fail to teach or suggest intra-terminal determination and communication of multimedia capabilities as

described in Section A, it can be shown that this combination fails to teach or suggest a "determining a set of system parameters affecting the establishment of the multimedia session in response to the request" and "forming the session descriptor based on the system parameters."

For the reasons discussed above in connection with Section A, Applicant respectfully maintains that the combination of Klemets, Dickerman, and Keller fails to teach or suggest each of the claim limitations of Claim 22. Dependent Claim 23 depends from independent Claim 22 and also stand rejected under 35 U.S.C. §103(a) over the above-discussed combination of Klemets, Dickerman, and Keller. While Applicant does not acquiesce with any particular rejections to these dependent claims, including any assertions concerning common knowledge, obvious design choice and/or what may be otherwise well-known in the art, it is believed that these rejections are moot in view of the arguments made in connection with the independent claim.

For at least this reason, the Applicant submits that the Examiner's rejection of Claims 22 and 23 includes errors of finding of fact, which has led to a rejection that is grounded in an error of law. The Applicant respectfully submits that the resulting error of law compels withdrawal of this rejection, as *prima facie* obviousness is not established.

D. The §103(a) rejection of Claims 26, 27, and 29 is improper because the reasons for rejection were not fully and clearly stated, and because the asserted combination of Klemets, Dickerman, and Keller fails to teach or suggest all the limitations of the claimed invention.

According to the Office Action, Claim 26 "is rejected for the same reasons set forth in claim 1 above," and further cites portions of Klemets that allegedly teach or suggest "verifying the session descriptor based on a set of multimedia session parameters that describe multimedia capabilities of the terminal." Without acquiescing to these characterizations, the Applicant submits that a rejection "for the same reasons set forth in claim 1 above" does not address all the recitations Claim 26. For example, Claim 26 recites "communicating the session descriptor to a session descriptor module of the terminal that

operates independently of the application" whereas Claim 1 recites "communicating the session descriptor request from the application to a session descriptor module of the terminal."

Although Claims 1 and 26 may share similar characteristics relating to various embodiments of the disclosed invention, these claims use noticeably different wording. In particular, the communication of a "session descriptor" from an application to a session descriptor module is different than the communication of a "session descriptor request" from an application to a session descriptor module. These differences should be apparent based on the context of the claims (e.g., "initiating a multimedia session" versus "joining a multimedia session") and in view of the other claim limitations in the respective claims. As such, Applicant cannot conclusively determine which parts of the asserted references are allegedly being applied to the various features of Claim 26.

Nonetheless, Applicant submits that the reasons given in Section A above that the combination of Klemets, Dickerman, and Keller fail to teach or suggest any communication between an application and session description module running on the same terminal, are also sufficient to show that the combination of references fails to teach or suggest a instructions for "receiving from an independently operating application of the terminal a request for a session description." Similarly, because the combination of Klemets, Dickerman, and Keller fail to teach or suggest intra-terminal determination and communication of multimedia capabilities as described in Section A, it can be shown that this combination fails to teach or suggest a "determining a set of system parameters affecting the establishment of the multimedia session in response to the request" and "forming the session descriptor based on the system parameters."

For the reasons discussed above in connection with Section A, Applicant respectfully maintains that the combination of Klemets, Dickerman, and Keller fails to teach or suggest each of the claim limitations of Claim 22. Dependent Claim 23 depends from independent Claim 22 and also stand rejected under 35 U.S.C. §103(a) over the above-discussed combination of Klemets, Dickerman, and Keller. While Applicant does not acquiesce with any particular rejections to these dependent claims, including any assertions

concerning common knowledge, obvious design choice and/or what may be otherwise well-known in the art, it is believed that these rejections are moot in view of the arguments made in connection with the independent claim.

For at least this reason, the Applicant submits that the Examiner's rejection of Claims 26, 27, and 29 includes errors of finding of fact, which has led to a rejection that is grounded in an error of law. The Applicant respectfully submits that the resulting error of law compels withdrawal of this rejection, as *prima facie* obviousness is not established.

E. The §103(a) rejection of Claims 17, 18, 20, and 21 is improper because the asserted combination of Klemets, Dickerman, and Keller fails to teach or suggest all the limitations of the claimed invention.

For the reasons discussed above in connection with Section A, Applicant respectfully maintains that the combination of Klemets, Dickerman, and Keller fails to teach or suggest all the limitations of Claim 17. The rejection relies in large part on FIG. 6 of Klemets, which shows "a general purpose computing device in the form of a computer." (Klemets, 0080). As with the rejection of the other claims in Section A, the rejection of Claim 17 still relies on Klemets' descriptions of data structures in paragraphs 0017, 0048, and 0097-0139 to show a session description module that operates independently of an application and that receives a request for a multimedia session descriptor from the application and communicate a multimedia session descriptor to the application to enable establishment of the multimedia session via the application. As is explained in more detail in Section A, Applicant submits that the disclosure of data structures cannot be relied upon to disclose functional modules as set forth in the Applicant's claims.

Moreover, Applicant points out that Klemets does disclose "application programs 146, other program modules 148, and program data 150" in relation to FIG. 6. (Klemets, 0082). Thus, even though Klemets differentiates between application programs, program modules, and program data, Klemets fails to teach or suggest that the disclosed program modules and application programs of the illustrated computer operate as described in relation to Applicant's Claim 17. In particular, Klemets fail to teach or suggest a session

descriptor module that receives a request for a multimedia session descriptor from the application to determine multimedia capabilities of a terminal, determine a set of multimedia parameters of the terminal, form the multimedia session descriptor based on the set of multimedia parameters of the terminal, and communicate the multimedia session descriptor to the application to enable establishment of the multimedia session via the application.

Dependent Claims 18, 20, and 21 depend from independent Claim 17 and also stand rejected under 35 U.S.C. §103(a) over the above-discussed combination of Klemets, Dickerman, and Keller. While Applicant does not acquiesce with any particular rejections to these dependent claims, including any assertions concerning common knowledge, obvious design choice and/or what may be otherwise well-known in the art, it is believed that these rejections are moot in view of the arguments made in connection with the independent claim. For at least this reason, the Applicant submits that the Examiner's rejection of Claims 17, 18, 20, and 21 includes errors of finding of fact, which has led to a rejection that is grounded in an error of law. The Applicant respectfully submits that the resulting error of law compels withdrawal of this rejection, as *prima facie* obviousness is not established.

F. The §103(a) rejection of Claims 3, 5, 6, 14, 24, 28 and 32 is improper because the asserted combination of Klemets, Dickerman, Keller, and Sen fails to teach or suggest all the limitations of the claimed invention.

For the reasons discussed above in connection with Sections A, B, C, and D, Applicant respectfully maintains that the combination of Klemets, Dickerman, and Keller, alone or modified with the teachings of Sen, fails to teach or suggest each of the claim limitations. Dependent Claims 3, 5, and 6 are dependent on independent Claim 1; dependent Claim 14 is dependent on independent Claim 12; dependent Claim 24 is dependent on independent Claim 22; and dependent Claim 32 is dependent on independent Claim 30. As set forth above, the combination of Klemets, Dickerman, and Keller fails to teach or suggest each of the limitations of Claims 1, 12, 22, and 32. Sen fails to remedy the

above-discussed deficiencies of the asserted combination of Klemets, Dickerman, and Keller; therefore, the combination of Klemets, Dickerman, Keller and Sen fails to teach or suggest each of the limitations of Claim 3, 5, 6, 14, 24, 28 and 32. For at least these reasons, *prima facie* obviousness has not been established for the rejection of dependent Claims 3, 5, 6, 14, 24, 28 and 32. Applicant accordingly submits that the rejection is improper and requests that it be withdrawn.

G. The §103(a) rejection of Claims 8, 10, 11 and 25 is improper because the asserted combination of Klemets, Dickerman, Keller, and Nuutinen fails to teach or suggest all the limitations of the claimed invention.

For the reasons discussed above in connection with Sections A and C, Applicant respectfully maintains that the combination of Klemets, Dickerman, and Keller, alone or modified with the teachings of Nuutinen, fails to teach or suggest each of the claim limitations. Dependent Claims 8, 10, 11 are dependent on independent Claim 1, and dependent Claim 25 is dependent on independent Claim 22. As set forth above, the combination of Klemets, Dickerman, and Keller fails to teach or suggest each of the limitations of Claims 1 and 22. Nuutinen fails to remedy the above-discussed deficiencies of the asserted combination of Klemets, Dickerman, and Keller; therefore, the combination of Klemets, Dickerman, Keller and Nuutinen fails to teach or suggest each of the limitations of Claims 8, 10, 11 and 25. For at least these reasons, *prima facie* obviousness has not been established for the rejection of dependent Claim 8, 10, 11 and 25. Applicant accordingly submits that the rejection is improper and requests that it be withdrawn.

H. The §103(a) rejection of Claim 19 is improper because the asserted combination of Klemets, Dickerman, Keller, and Money fails to teach or suggest all the limitations of the claimed invention.

For the reasons discussed above in connection with Sections A and E, Applicant respectfully maintains that the combination of Klemets, Dickerman, and Keller, alone or modified with the teachings of Money, fails to teach or suggest each of the claim limitations. Dependent Claim 19 is dependent on independent Claim 17, and as set forth

above, the combination of Klemets, Dickerman, and Keller fails to teach or suggest each of the limitations of Claim 17. Money fails to remedy the above-discussed deficiencies of the asserted combination of Klemets, Dickerman, and Keller; therefore, the combination of Klemets, Dickerman, Keller and Money fails to teach or suggest each of the limitations of Claims 19. For at least these reasons, *prima facie* obviousness has not been established for the rejection of dependent Claim 19. Applicant accordingly submits that the rejection is improper and requests that it be withdrawn.

CONCLUSION

In view of the above, Applicant respectfully submits that the claimed invention is patentable over the cited references and that the rejections of Claims 1-32 should be withdrawn. Applicant further respectfully requests allowance of the entire application.

Authorization is given to charge Deposit Account No. 50-3581 (NSN.020.A1) any necessary fees for this filing. If the Examiner believes it necessary or helpful, the undersigned attorney of record invites the Examiner to contact the undersigned attorney to discuss any issues related to this case.

Respectfully submitted,

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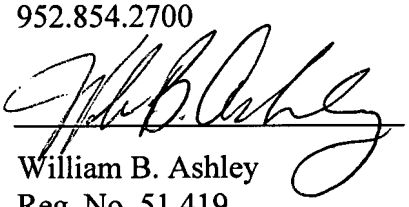
Date: 24 September 2007

By: 

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